

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>FARAH BROWN,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a Pharoh Brown</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy - 1 count)</b>
<b>a/k/a Jazz</b>	<b>:</b>	<b>18 U.S.C. § 1029(a)(1) (trafficking in,</b>
	<b>:</b>	<b>producing and using counterfeit access</b>
	<b>:</b>	<b>devices - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 1029(a)(2) (trafficking in and</b>
	<b>:</b>	<b>using unauthorized access devices - 1</b>
		<b>count)</b>
		<b>18 U.S.C. § 1029(a)(4) (possessing access</b>
		<b>device-making equipment - 1 count)</b>
		<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From in or about December 2004 to at least in or about June 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**FARAH BROWN,**  
**a/k/a Pharoh Brown,**  
**a/k/a Jazz,**

conspired and agreed with others known and unknown to the grand jury to knowingly and with intent to defraud traffic in and use unauthorized and counterfeit access devices, that is, credit cards, and to possess device-making equipment, thereby affecting interstate commerce, in

violation of Title 18, United States Code, Sections 1029(a)(1), (a)(2) and (a)(4).

**MANNER AND MEANS**

It was a part of the conspiracy that:

1. Defendant FARAH BROWN agreed to use a small electronic cloning or skimming device that was capable of copying data stored on the magnetic stripes of real credit cards, including the account number.
2. Defendant FARAH BROWN secretly used the skimming device at a museum in Philadelphia, Pennsylvania, running the credit cards of patrons at the museum through the device, thereby capturing the data from each card that was needed to manufacture counterfeit credit cards and otherwise make use of the account numbers.
3. Defendant FARAH BROWN gave the skimming device with the copied credit card account numbers to a person known to the grand jury to use in making counterfeit credit cards.
4. Counterfeit credit cards were made with the skimmed credit card account numbers, and the counterfeit credit cards were used by persons known and unknown to the grand jury to make fraudulent purchases worth approximately \$11,000 in, among other places, New Jersey and Pennsylvania.
5. As payment for copying the credit card account numbers and giving the skimming device to a person known to the grand jury, defendant FARAH BROWN was paid with counterfeit credit cards which she used to make fraudulent purchases worth approximately \$3,000.

### **OVERT ACTS**

In furtherance of the conspiracy, defendant FARAH BROWN, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. From on or about December 31, 2004 to at least on or about March 2, 2005, defendant FARAH BROWN possessed and used a skimming device at a museum in Philadelphia, running credit cards of patrons at the museum through the device, thereby capturing the data from each card that was needed to manufacture counterfeit credit cards.

2. From on or about December 31, 2004 to at least in or about March 2005, defendant FARAH BROWN used counterfeit credit cards, received as payment for skimming the credit card numbers, to make fraudulent purchases worth approximately \$3,000.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

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**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about December 31, 2004 to at least in or about June 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**FARAH BROWN,  
a/k/a Pharoh Brown,  
a/k/a Jazz,**

knowingly and with the intent to defraud trafficked in and used, and aided and abetted and willfully caused the trafficking in and use of, one or more unauthorized access devices, to obtain things of value aggregating \$1,000 or more during a one-year period, for a total of approximately \$3,000, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about December 31, 2004 to at least in or about June 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**FARAH BROWN,  
a/k/a Pharoh Brown,  
a/k/a Jazz,**

knowingly and with intent to defraud trafficked in, produced and used, and aided and abetted and willfully caused the trafficking in, production and use of, one or more counterfeit access devices, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

**COUNT FOUR**

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**THE GRAND JURY FURTHER CHARGES THAT:**

From on or about December 31, 2004 to at least on or about March 2, 2005, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**FARAH BROWN,  
a/k/a Pharoh Brown,  
a/k/a Jazz,**

knowingly and with intent to defraud possessed device-making equipment, that is a skimming device designed to capture credit card numbers and related data as the credit cards are swiped through the device, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Section 1029(a)(4).

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 1029(a)(1), (a)(2) and (a)(4), as set forth in Counts Two, Three and Four of this indictment, defendant

**FARAH BROWN,  
a/k/a Pharoh Brown,  
a/k/a Jazz,**

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C), any and all property, real and personal, constituting and derived from proceeds obtained directly or indirectly as a result of such violations, and any personal property used or intended to be used to commit the offenses.

2. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without

difficulty, it is the intent of the United States, pursuant to Title 18, United States Code, Sections 982(b)(1) and 1029(c)(2), incorporating Title 21, United States Code § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**